AMENDMENT TO THE DRAWING(S)

Figs. 1, 3, 4 and 7 have been amended. The attached sheets of formal drawings replace the original sheets including Figs.1, 3, 4 and 7. Reference "22" is being replaced with - - 20 - - to conform the drawings to the specification.

REMARKS/ARGUMENTS

Claims 9-12 were rejected under 35 U.S.C. §§112 and 102. Claims 9-12 are being canceled.

On page 3 of the Office Action, the Examiner rejects claim 13 under 35 U.S.C. §112, second paragraph. The Examiner's objection has been satisfied by a non-limiting cosmetic amendment. Therefore, the §112 rejection should now be withdrawn.

Claims 13-16 were rejected as being obvious over Kuroda et al. '098 in view of Yoo '932. Kuroda et al. '098 corresponds to Kuroda et al., US Patent No. 6,761,178, already of record.

In Kuroda et al., as shown in FIGS. 3-4, it is suggested that wafer chucks pass wafers to a wafer guide, and the wafer guide immerses the wafers in a cleaning bath for cleaning treatment. Particularly, in Col. 3, paragraph [0046], Kuroda et al. states, "As shown in FIG.4, the wafer guide 31 is equipped with three parallel holding members 43a, 43b, 43c. Each of the holding members 43a to 43c has a plurality (e.g. fifty) of grooves 44 formed at regular intervals to hold peripheral lower parts of the wafers W. When inserting the peripheries of fifty wafers W of two carriers C into the grooves 44 formed on the holding members 43a to 43c respectively, the wafer guide 31 is capable of retaining the plural wafers W while they are arranged at regular intervals."

It will be understood from the above that Kuroda et al. sets the wafer guide in the cleaning bath before the treatment, solely for carrying out a standby step. Kuroda et al. does not apparently control movement of the wafer guide so as to preheat the substrate holding device before treatment as recited in claim 13.

Kuroda et al. neither discloses nor suggests the structure defined in claim 13 of this application, i.e., "a substrate holding device that...immerses the substrates in the heated treating solution stored in said treating tank" having a back plate, and "said back plate having a heating device".

Thus, Kuroda et al. neither discloses nor suggests the construction of claim 13, first, including the heating device in the back plate of the substrate holding device; and second, wherein the controller controls the heating device to preheat the back plate, before controlling the substrate holding device to immerse the substrates in the heated treating solution stored in the treating tank.

In an attempt to supplement Kuroda et al., the latest Office Action has newly cited U.S. Patent No. 6,207,932 (Yoo et al.).

Yoo et al. states, "The body 100 includes a heated element 106 wrapped with a hot wire 104 and a wafer support 102 for conveying the heat generated from the heated element 106 to the wafer support 102, wherein the wafer support 102 is located on the upper part pf the body 100." (see Column 1, lines 29-33, and Figs. 1 and 2). Yoo et al. further states, "a plurality of the heated elements 206, each wrapped with a hot-wire 204, are provided in the body 200. The heat generated from the heated element 206 is conducted to the wafer support 202."

Yoo et al. discloses a wafer support 202 for holding a wafer and having heating elements 206 for warming the wafer under a gas treatment.

Yoo et al. is not relevant to the invention and cannot be combined with Kuroda et al. Claim 13 recites a substrate holding device that immerses the substrates in the heated treating solution. Yoo's "heater block" cannot suggest an immersible holding device because it cannot be immersed. Note the exposed hot-wires 204.

The Examiner says incorrectly that "Yoo teaches a controller 201 that controls the operation such that wafer support 202 is preheated before treatment of substrates 110 (column 3, line 40 to column 4, line 35). In fact, the controller 201 only sets the temperature of the heated elements 206. It has no function relating to any order of operations.

Further, Yoo's heating elements are simply for heating a wafer to enhance a gas treatment of the wafer. They cannot suggest anything about the claimed system, which includes a system for heating a substrate holder. As discussed in the application, the substrate holder is heated, so that the substrate holder does not cool a heated liquid in which the substrates being treated are immersed.

Yoo et al. is thus irrelevant to the invention of claim 13, which treats substrates as immersed in a treating solution. Therefore, the wafer support 102, 202 of Yoo et al. cannot suggest the substrate holding device of the present invention.

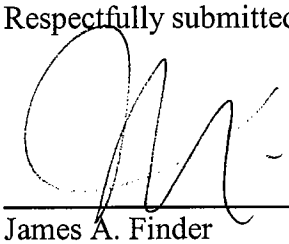
Thus, the references cited (Kuroda et al. and Yoo et al.), either individually or combined, neither disclose nor suggest the construction of the invention of claim 13, including the heating device in the back plate of the substrate holding device, which immerses the substrates in the heated treating solution stored in the treating tank.

Allowance of claims 13-16 is therefore requested.

THIS CORRESPONDENCE IS BEING SUBMITTED ELECTRONICALLY THROUGH THE PATENT AND TRADEMARK OFFICE EFS FILING SYSTEM ON April 6, 2007.

JAF:lf

Respectfully submitted,



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